Rachel Wobschall
Executive Director

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Office of the Secretary, Federal Communications Commission

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A System of Technology to
Achieve Results

To whom it may concern:

This letter is in response to proposed rules on telecommunications. I am the public policy intern

for the STAR Program, a federally funded, state run organization for people with disabilities. We

are concerned that people with disabilities get the assistive technology that they need to live

independently. The "Universal Service" directives of the Telecommunication Act have tremendous

potential for helping our people achieve their goals. I appreciate the opportunity to comment on the

proposed rules.

> C. Support for low income consumers
>   1. What services to support
> 50. ... [W]e seek comment on whether designation of additional services that would be
> specifically appropriate for low-income users....We invite the commenters to address
> whether there are any particular services, technical capabilities, or features that would be of
> benefit to low income consumers and that meet one or more of the criteria for inclusion
> among the services that should receive universal service support..."

In today's society, most people need to have regular phone access, but for people with

disabilities it is especially important. For those who are not ambulatory, the phone is access to the

rest of the world and is a safety device in an emergency. Much is already being done in this area

with special programs and adaptive equipment. The fear is that these programs will be lost if there

is an expansion to the general population.

More research should be done on the possibility of people with disabilities being able to

work full time via the telephone. Possibly in a customer service capacity. Non face to face

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interaction can be a great equalizer and could allow people with disabilities to be employed where without the access, it would be impossible. Perhaps partnerships with companies needinf these services could be established. Some attention should be paid to working with Vocational Rehabilitation and other agencies for people with disabilities to help pay for the cost of the technology.

> 51. Free Access to Telephone Service Information. ... Such free telephone access to the phone company central office would be of primary significance for measured rate subscribers, who are charged for each local call they make on either a per call or per minute basis, because subscribers with flat rate local service generally may make routine service inquiries without incurring extra charges.

Free access to billing information and line problems needs to be protected. As a matter of policy, allowing a company to charge for this type of information would encourage phone companies to be non-responsive to customer complaints. On the one hand, a company would never get rich doing this, but on the other hand they are not encouraged to fix the problem either. Maintaining free access would encourage people to keep their phone equipment in good repair and to alert the company of any line problems. It is also imperative to have free calls for emergencies. That is, protect the free access to 911 services.

> 72. Access to telecommunication services is important to schools classrooms , and libraries,and rarul health care porviders for a number of reasons...

Computers in the classroom are necessary, and adaptive equipment is equally important so that all students can use the computers. Access to computers is needed in all of the areas mentioned above, but a more general access is also necessary for people who are out of school and for students after school. To become proficient on a computer, you must have the opportunity to use it regularly.
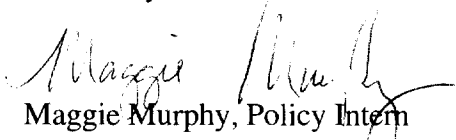
People with low income, including people with disabilities, do not always own a computer. Giving everyone a computer is not a realistic alternative. One approach is to have public sites. Having them at libraries is logical, but library hours are so limited that other locations might be more beneficial. These sites could be run on cards, such as credit cards or prepaid access cards (like copy cards). At least initially there would have to be some sort of educational component,

and probably it would be helpful to have on line tutorials on an ongoing basis and phone access to live help. The site would have to be located somewhere that is open long hours, like an all night laundry, a grocery store, a gas station, or perhaps someplace where personnel are always there but doesn't normally work with the public like a radio or television station. The site would have to be located near public transportation to be useful. It would also have to have enough privacy to allow thoughtful reflection.

Rate setting is always problematic. The rate needs to be low enough to allow access to people with low incomes but high enough so that the service is not discontinued every time there is a financial crisis. Perhaps one half the minimum wage per hour of use. Enough so that the access would have value without being prohibitively expensive. Or a reasonable calculation might be the actual cost of running the equipment and paying for the ongoing educational component. The initial purchase of the public equipment, line repairs etc. should be realistically calculated and planned for to be paid either by a private access tax (like the Part 36 rules) or through general tax revenues.

Thank you for the opportunity to comment on these

Siuncerely,

Maggie Murphy, Policy Intern